

REMARKS

Applicants' attorney is appreciative of the telephone interview granted by Examiner Perrin on November 20, 2009. During that interview, the Examiner expressed the opinion that the claimed invention appeared to be patentable over the art of record, and requested that several formal changes be made to the claims to change the "means for" language.

Claim 17 has now been amended as requested by the Examiner. Claims 19 and 24 have been amended to use language in agreement with the language of claim 17 as amended.

Claims 17-32 have been rejected under 35 USC 103(a) over van der Tak in view of Ajnefors. The Office action alleges that van der Tak discloses a scrubbing machine for cleaning the hull of a ship, comprising a holder in which a brush 3 is rotated around the rotary brush shaft with a drive means 4 for the rotary brush shaft. The Office action further alleges that van der Tak discloses the claimed invention except for the use of nozzles, which is disclosed by Ajnefors. This citation of references, however, does not logically lead to the claimed invention.

It is to be noted that the claimed invention is directed to a disc with a separate drive means, having a plurality of nozzles mounted thereon, each of the nozzles being connected to a source of fluid, where the fluid itself causes the disc member to rotate. Thus, two means are provided for rotation of the disc.

Other than the general knowledge in the art that both brushes and nozzles may be used to clean a ship's hull, there is no suggestion of utilizing a nozzle in the apparatus of van der Tak, and no suggestion of how such a nozzle would be provided in combination with this apparatus. Moreover, the device of the invention includes a plurality of nozzles, not a single nozzle, and it is completely unclear how one would

mount a plurality of nozzles to a device such as is shown in Figure 1 of van der Tak.

Moreover, Ajnefors is directed to a specific type of nozzle, one in which the nozzle is arranged to pivot up and down and rotate about an axis, in order to distribute the washing effect over a given surface area.


Since there does not appear to be any means by which one of ordinary skill in the art could mount such a nozzle on the brush or disc of van der Tak, the Office action is evidently alleging that one would mount a nozzle in any way possible on the apparatus of van der Tak simply because a nozzle is known to clean the hull of a ship, and that the remainder of the teaching of Ajnefors may be ignored.

While van der Tak does disclose a rotating disc, that rotating disc is provided solely for cleaning utilizing a brush. Even taking the references in combination, there is no disclosure or suggestion that a nozzle should be mounted on the disc in combination with or in preference to a brush or that a plurality of nozzles should be mounted on a disc, the nozzles being mounted in a specific orientation in comparison with the rotation of the disc provided by separate means.

Withdrawal of this rejection is requested.

In view of the foregoing amendments and remarks, Applicants submit that the present application is now in condition for allowance. An early allowance of the application with amended claims is earnestly solicited.

Respectfully submitted,



Ira J. Schultz
Registration No. 28666
Attorney for Applicants
(703)837-9600, ext. 23

Dennison, Schultz & MacDonald
1727 King Street, Suite 105
Alexandria, VA 22314